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June 2, 2023

BY ECF

Judge Kiyo A. Matsumoto
United States District Court
Eastern District of New York
225 Cadman Plaza East
Courtroom 6C South
Brooklyn, New York 11201

Re: Falls Lake Nat'l Ins. Co.v. Kalnitech Constr. Corp. et. al.
Docket No: 1:22-cv-01473-KAM-PK
Our File No: 19-208

Dear Judge Matsumoto,

I represent the plaintiff, Falls Lake National Insurance Company ("Falls Lake"), in the above-referenced action. I write to the Court, with consent of all parties in the above-referenced action, to request that the Pre Motion Conference scheduled for July 13, 2023 be cancelled because the parties have agreed on the schedule for the motion for summary judgment on our own. Plaintiff is to file their motion on July 7, 2023, opposition or cross-motions are due August 4, 2023, and plaintiff will file any reply by August 14, 2023.

Respectfully submitted,
MIRANDA SLONE SKLARIN VERVENIOTIS LLP

s/Steven Verveniotis

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cc: All counsel of record by ECF